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VIA ECF

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Hon. Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square, Room 2102
New York, New York 10007

Re: Shixu Bai v. Tegs Management, LLC, et al.; Docket No.: 20-cv-4942 (AJN) (RWL)

Dear Judge Nathan:

In addition to Defendants Tegs Management, LLC (“TEGS”) and Grand Market International Corporation (“GMI”) (collectively “Corporate Defendants”), this firm represents individual Defendants Eduard Shnayder, Gregory Tolston, Syoma Shnayder, Arthur Gavrilov, Albert Niyazov, and Beni Sneider (collectively “Individual Defendants”) in the above referenced matter. As more specifically described below, we write with Plaintiff’s consent to request a stay of the time for the Individual Defendants to move or answer with regard to the Third Amended Complaint.

While Plaintiff’s Third Amended Complaint was filed on June 8, 2021, the Individual Defendants were not served until the period between August 31 and September 7, 2021. As the Court knows, on July 22, 2021, the Corporate Defendants filed a pre-answer motion to dismiss that will be fully briefed and submitted on or before September 28, 2021. *See ECF Doc. No. 117.*

Since the claims against the Individual Defendants are virtually the same as asserted against the Corporate Defendants, it is respectfully submitted that if the instant motion to dismiss is granted, the claims against the Individual Defendants will likewise fail. If, however, the motion is denied, the Court’s decision will impact and guide the Individual Defendants’ response to the Third Amended Complaint. Accordingly, in order to avoid having to file a motion to dismiss on behalf of the Individual Defendants, make the same arguments as already set forth in the Corporate Defendants’ motion, and burden the court and the parties with unnecessary motion practice at this point, **we respectfully request that the Individual Defendants’ time to answer or move with regard to the Third Amended Complaint be stayed until 30 days after the Court’s decision on the Corporate Defendants’ motion to dismiss.**

This is the Individual Defendants’ first request for an extension and, again, Plaintiff has consented to this request.

Thank you for the court’s consideration.

Respectfully submitted,

/s/ Arthur M. Rosenberg

cc: All Counsel (*via ECF*)

SO
ORDERED.

Alison J. Nathan

9/15/21